

## Hoag, Katherine

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**From:** Hoag, Katherine  
**Sent:** Thursday, March 14, 2013 4:49 PM  
**To:** [prainey@arb.ca.gov](mailto:prainey@arb.ca.gov)  
**Cc:** Kurpius, Meredith; Flagg, MichaelA  
**Subject:** RE: Request for information.

Hi Chris –

That sounds good. Yes I think we definitely said that the district's audits could count for one of the two semi-annual flow audits (I'm sure Michael or Meredith will chime in if I'm way off base). While their gaseous audits might not be independent enough etc to be counted as NPAP, they could potentially meet the annual PE requirement, so if you wanted to handle them differently, that may be possible.

Thanks for keeping us posted.

Kate

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Katherine Hoag, Ph.D.  
U.S. EPA, Region 9  
Air Quality Analysis Office (AIR-7)  
75 Hawthorne Street  
San Francisco, CA 94105  
[Hoag.Katherine@epa.gov](mailto:Hoag.Katherine@epa.gov)  
(415) 972-3970

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**From:** Rainey, Patrick@ARB [<mailto:prainey@arb.ca.gov>]  
**Sent:** Tuesday, March 12, 2013 7:54 AM  
**To:** Hoag, Katherine  
**Cc:** Kurpius, Meredith; Flagg, MichaelA  
**Subject:** RE: Request for information.

Hello Kate,

Thank you for the response. This is the division of responsibilities I am planning to discuss with GBUAPCD and include in the R&R document. I know they have been performing their own audits using internal QA staff for many years, but in the past I don't believe these audits have been considered as part of the NPAP/PEP audits or entered into AQS as accuracy data for meeting the CFR requirement. I primarily wanted to confirm that their audit procedures had been found acceptable by EPA for meeting the semi-annual flow rate audit requirement, and that it would be acceptable for GBUAPCD to perform re-audits of parameters found during ARB or GBUAPCD audits to be outside of criteria.

The NCore issue is one that we can continue to work with you on. I am not sure of the current status of the NCore site but will ask Chris about it when I talk to him next.

Thank you,

Patrick Rainey  
Air Pollution Specialist  
Quality Management Section  
Monitoring and Laboratory Division  
(916) 327-4756

[prainey@arb.ca.gov](mailto:prainey@arb.ca.gov)

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**From:** Hoag, Katherine [<mailto:Hoag.Katherine@epa.gov>]  
**Sent:** Friday, March 08, 2013 4:28 PM  
**To:** Rainey, Patrick@ARB  
**Cc:** Kurpius, Meredith; Flagg, MichaelA  
**Subject:** RE: Request for information.

(fyi - Meredith and Michael)

Hi Patrick,

Is this what you CARB and GBUAPCD agreed on? I think the division of the responsibilities would be fine with us and meets the requirements, and I think any division of labor that meets the requirements and ensures quality data that CARB and GBUAPCD agree on would be fine with us.

For the NCore site, I think the same arrangement would be fine for O3 and the PM monitors, we'll have to keep working on the trace-level instruments at NCore (CO, SO2, NOy) in general – but that is a statewide issue. Is their NCore site operational now?

Kate

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Katherine Hoag, Ph.D.  
U.S. EPA, Region 9  
Air Quality Analysis Office (AIR-7)  
75 Hawthorne Street  
San Francisco, CA 94105  
[Hoag.Katherine@epa.gov](mailto:Hoag.Katherine@epa.gov)  
(415) 972-3970

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**From:** Rainey, Patrick@ARB [<mailto:prainey@arb.ca.gov>]  
**Sent:** Monday, March 04, 2013 12:58 PM  
**To:** Hoag, Katherine  
**Subject:** RE: Request for information.

Hello Kate,

I am in the process of individualizing the PQAO Roles and Responsibilities document for Great Basin and wanted to confirm a couple of items regarding the ARB/Great Basin audit arrangement.

- ARB will continue to perform an annual audit of all gaseous, flow, and Met parameters that are reporting data for record.
- ARB and GBUAPCD will coordinate schedules so the semi-annual flow audits performed by ARB and GBUAPCD are performed 5-7 months apart, and the agency performing the audit is responsible for reporting audit results to AQS within 90 days following the end of the quarter.
- GBUAPCD will utilize a documentation mechanism (preferably the ARB CAN process) for documenting any issues or failures encountered during the audit. Documentation of any audit failures will be communicated to ARB.

- Either ARB or GBUAPCD may perform a re-audit of parameters that failed during the original audit. Responsibility for re-audits will be determined between ARB and GBUAPCD based on resource availability.

Will these arrangements also be acceptable for the GBUAPCD NCORE site?

Thank you for your help on this.

Patrick Rainey  
Air Pollution Specialist  
Quality Management Section  
Monitoring and Laboratory Division  
(916) 327-4756  
[prainey@arb.ca.gov](mailto:prainey@arb.ca.gov)

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**From:** [Hoag.Katherine@epamail.epa.gov](mailto:Hoag.Katherine@epamail.epa.gov) [<mailto:Hoag.Katherine@epamail.epa.gov>]  
**Sent:** Tuesday, November 20, 2012 12:31 PM  
**To:** Rainey, Patrick@ARB  
**Cc:** [Flagg.MichaelA@epamail.epa.gov](mailto:Flagg.MichaelA@epamail.epa.gov); Deidrick, Chris@ARB; [Kurpius.Meredith@epamail.epa.gov](mailto:Kurpius.Meredith@epamail.epa.gov)  
**Subject:** Re: Request for information.

Hi Patrick,

I do remember some issues with Great Basin flow audit scheduling during the windy season, but I don't remember how Merrin resolved it. I've cc'ed Chris since he was often included in those discussions as well. I think it is fine to split up the semiannual flow audits the way you describe so that CARB does one and Great Basin does one...it just adds a little bit of scheduling complication if plans change to still be able to meet the 5-7 month separation between audits guidance that needs to be met for proper AQS data and reports.

In terms of who (between CARB and a District) does what to fulfill this and other requirements, I think it's really up to you and the District to negotiate - and then I think the idea is to get it documented in the PQAO agreement letter.

Let me know if you need anything else-

Kate

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Katherine Hoag, Ph.D.  
U.S. EPA, Region 9  
Air Quality Analysis Office (AIR-7)  
75 Hawthorne Street  
San Francisco, CA 94105  
[Hoag.Katherine@epa.gov](mailto:Hoag.Katherine@epa.gov)  
(415) 972-3970

From: Meredith Kurpius/R9/USEPA/US  
To: Katherine Hoag/R9/USEPA/US@EPA, MichaelA Flagg/R9/USEPA/US@EPA,  
Cc: "Rainey, Patrick@ARB" <[prainey@arb.ca.gov](mailto:prainey@arb.ca.gov)>  
Date: 11/19/2012 01:05 PM  
Subject: Re: Request for information.



Monitoring and Laboratory Division  
(916) 327-4756  
[prainey@arb.ca.gov](mailto:prainey@arb.ca.gov)

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